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Attorneys for Plaintiffs, MARIA VALENCIA, UVALDO VALENCIA, ALEJANDRO
VALENCIA, JOSE VALENCIA, ABEL VALENCIA, SOTERO VALENCIA, GUSTAVO
VALENCIA, individually and as successors in interest to Gracia Valencia de Viveros

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

MARIA VALENCIA,)	CASE NO: 1:05-CV-00472-
UVALDO VALENCIA,)	AWI-LJO
ALEJANDRO VALENCIA,)	
JOSE VALENCIA, ABEL)	
VALENCIA, SOTERO VALENCIA, and)	STIPULATION BETWEEN
GUSTAVO VALENCIA, individually and as)	PARTIES TO EXTEND
successors in interest for Gracia Valencia de)	TRIAL DATE AND
Viveros,)	SCHEDULING ORDER
Plaintiffs,)	DATES;
vs.)	ORDER THEREON
)	
FAMILY HEALTHCARE NETWORK,)	
MELANIE MURPHY, D.D.S.,)	
NOAH ALEX AGARD, D.D.S.,)	
HENRY CAMILO CISNEROS, JR, D.D.S,)	
GUADALUPE QUEZADA, D.D.S.,)	
ANTONIO F. SANCHEZ, M.D.;)	
PUBLIC HEALTH SERVICE;)	
THE UNITED STATES DEPARTMENT OF)	
HEALTH AND HUMAN SERVICES;)	
THE UNITED STATES OF AMERICA, and)	
DOES 1 – 50, inclusive,)	

**STIPULATION BETWEEN PARTIES TO EXTEND TRIAL DATE AND SCHEDULING ORDER
DATES; [PROPOSED] ORDER THEREON**

Defendants.

TO THE CLERK OF THE COURT, ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE that Plaintiffs, by and through their counsel of record and Defendants, FAMILY HEALTHCARE NETWORK et. al., and United States of America, by and through its counsel of record, upon having conducted discovery including written discovery and depositions, and for five to six depositions of key individuals remaining and for other discovery to be completed, the parties do hereby stipulate to extend the trial date and other certain dates in the Scheduling Order:

EXTENDED DEADLINE:	OLD DATE	NEW DATE
Rule 26 Expert Disclosure	September 26, 2006	November 27, 2006
Supplemental Expert Disclosure	October 9, 2006	December 8, 2007
Expert Discovery Cutoff	November 28, 2006	January 29, 2007
Settlement Conference	October 26, 2006	December 27, 2007
Dispositive Motion Deadline	December 7, 2006	February 9, 2007
Last Day to Hear Motions	January 7, 2007	March 9, 2007
Pre-Trial Conference	January 4, 2007	March 9, 2007
Trial	March 6, 2007	May 7, 2007

STIPULATION BETWEEN PARTIES TO EXTEND TRIAL DATE AND SCHEDULING ORDER DATES; [PROPOSED] ORDER THEREON

Based on the above, GOOD CAUSE exists in support of the parties' stipulated extension.

IT IS SO STIPULATED:

Respectfully submitted,

Dated: September 5, 2006

Dated: September , 2006

/s/ Kent M. Henderson

/s/ Kristi C. Kapetan

Kent M. Henderson, Esq.

Kristi C. Kapetan, Assistant U.S.

LAW OFFICES OF FEDERICO C.

Attorney

SAYRE

UNITED STATES ATTORNEY'S

Attorneys for Plaintiffs

OFFICE

Attorneys for Defendant

United States of America

IT IS SO ORDERED.

Dated: September 11, 2006

/s/ Lawrence J. O'Neill

66h44d

UNITED STATES MAGISTRATE JUDGE

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**STIPULATION BETWEEN PARTIES TO EXTEND TRIAL DATE AND SCHEDULING ORDER
DATES; [PROPOSED] ORDER THEREON**